INSTITUTE OF INTERNATIONAL BANKERS

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May 2, 2003

The Honorable William M. Thomas Chairman Committee on Ways and Means U.S. House of Representatives 2208 Rayburn House Office Building Washington, DC 20515-0521

Dear Mr. Chairman:

Thank you for meeting with us yesterday to discuss the changes that you are making in the "earnings stripping" proposal. We fully support your changes because they recognize that the worldwide limitation (whether or not in conjunction with safe harbor ratios) is not workable for financial institutions and that any limitation imposed on the deductibility of interest expense should be based on a net interest concept.

We believe that the changes that you described will enable internationally headquartered financial institutions to continue to make a major contribution to the depth and liquidity of U.S. capital markets.

Based on your description, we support your legislation to reform and simplify the international tax system, and we welcome the opportunity that you extended for us to review the bill and to work with you and your staff as the process develops.

Very truly yours,

Robert B. Mills

RBMills

Chairman

Lawrence R. Uhlick

Executive Director and

Towerce L. Uhlick

General Counsel

cc: John Kelliher Bob Winters Greg Nickerson

The Institute's mission is to help resolve the many special legislative, regulatory and tax issues confronting internationally headquartered financial institutions that engage in banking, securities and/or insurance activities in the United States.